



Chemical Waste Management, Inc.

ENRAC Division - Midwest
7250 West College Drive
Palos Heights, Illinois 60463
708/361-8400

cc: S Smith

A Faust

B Foster

D Grundmann

February 21, 1992

J. F. Fritsch
MONSANTO CHEMICAL COMPANY
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167

R & 2/24/92

**SUBJECT: PRELIMINARY COST ESTIMATE
DEAD CREEK PROJECT WORK
CWM-ENRAC CONTROL NO. 91-11-212**

Dear Sir/Madam:

The Environmental Remedial Action Division of Chemical Waste Management Remedial Services (CWM-ENRAC) is pleased to present this preliminary cost estimate to Monsanto Chemical Company (Monsanto) for the onsite remediation, waste transportation, and waste disposal services related to the Dead Creek - Sector B and Site M Project located in Sauget and Cahokia, Illinois. CWM-ENRAC's approach to the project is based on information contained in your request dated February 5, 1992, and on drawings provided with correspondence received from Gordon A. Grundmann dated February 13, 1992.

In providing the attached information, CWM-ENRAC has satisfied the following three Monsanto requests

- *A cost estimate based on Monsanto's Preliminary Scope of Work dated January 31, 1992.*
- *A preliminary project schedule outlining the days per week and the hours per day planned for doing the work.*
- *An organization chart outlining the relationship of the personnel who will be working and interfacing on this project.*

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As requested, the preliminary cost estimate has been divided into the various segments of the work as follows:


- Design cost for the Workplans which include the HASP and the QAPP.
- Actual Field Work including Site Prep, Excavation of Sediments, Dewatering of Sediments, Water Management within the Excavations, Backfilling of the Excavations, and Loading the Sediments into Transportation Vehicles.
- Transportation Costs to the Disposal Facility.
- Disposal Costs at the Disposal Facility.

CWM-ENRAC's preliminary Scope of Work features a highly efficient approach for completing the project's requirements. CWM-ENRAC's approach incorporates Monsanto's requirements from the Preliminary Scope of Work, and is based on CWM-ENRAC's eleven years of experience in the remediation business. CWM-ENRAC has a proven track record in performing and completing sediment excavation projects involving dewatering and/or solidification and off-site landfilling. CWM-ENRAC's approach implements all compliance measures required in the Preliminary Scope of Work, in addition to maintaining compliance with both CWM-ENRAC's and Monsanto's safety requirements for all project-related personnel.

The following Preliminary Budget Estimate Proposal contains all the information required by Monsanto's letter dated February 5, 1992. It is CWM-ENRAC's pleasure to submit this Preliminary Budget Estimate Proposal to Monsanto for this project and look forward to personally discussing it with you at your convenience. If you have any questions regarding this budget estimate, please contact either Mark Leibrock at (708) 361 7536 or Dan Schmittiel at (708) 218-1682.

Sincerely,

**CWM REMEDIAL SERVICES
ENRAC MIDWEST**


Mark J. Leibrock, P.E.
Project Development Manager
MJL/plt
attachment


Dan Schmittiel
Corp. Business Development Manager

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1.0 SCOPE OF WORK

1.1 Introduction

The Scope of Work for this project involves the excavation, dewatering, loading, transportation, and off-site landfill disposal of approximately 9,000 tons of sediments. These sediments may be affected by organic compounds and metals and are located in the southern portion of Dead Creek - Sector B and Site M in Sauget and Cahokia, Illinois. CWM-ENRAC understands that Monsanto has requested budget estimate costs to reflect the following project activities:

PCB ?

1. *The preparation of workplans related to this project.*
2. *All on-site work including set-up of the site, excavation of sediments, dewatering of sediments, water management within the excavations, backfilling of the excavations, and the loading of the sediments into trucks.*
3. *Transportation to a Monsanto-approved disposal facility.*
4. *Disposal at a Monsanto-approved disposal facility.*

CWM-ENRAC recognizes the remediation activities required in the Preliminary Scope of Work provided by Monsanto, and has prepared this budget estimate accordingly.

1.2 Preparation of Workplans

Prior to mobilization to the site, CWM-ENRAC will prepare the appropriate workplans in accordance with all applicable USEPA guidelines. These workplans will ensure that all

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Federal, State, and Local regulatory requirements will be met. These workplans, including the Health and Safety Plan (HASP), the Quality Assurance Project Plan (QAPP), etc., will be submitted for Monsanto's review and approval prior to mobilization.

In addition to the HASP and QAPP, drawings indicating site layout, lists of project personnel, contingency plans, project schedules, and dust and odor control plans will be included.

1.3 On-site Work

The budgetary cost estimates associated with the onsite work are presented in Section 2.0. These costs include providing all labor, materials, equipment, and supervision required to establish the necessary temporary facilities and execute, manage, and document the entire project in accordance with the Monsanto Preliminary Scope of Work.

Included in the Scope of Work is the pre-project setup and post-project removal of all temporary facilities and utilities required. These will include on-site roads, personnel and equipment decontamination facilities, administrative offices for CWM-ENRAC, Monsanto, Geraghty & Miller, and IEPA personnel, security facilities, fencing, storage facilities, and maintenance facilities. Also included will be the provision of all personal protective equipment (PPE), monitoring equipment, and on-site supervision and administration required.

The excavation of the affected sediments from this sector of Dead Creek and Site M will be preceded by the clearing and grubbing of the sites, where necessary, to facilitate the removal of the sediments. The sediment excavation will be directed by Monsanto or its representative, Geraghty & Miller, and will consist of the removal of the dark-colored and loose creek sediments above the underlying lighter-colored and more dense native soils.

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Prior to the loading of these sediments into transportation vehicles, all sediment materials will be dewatered to pass the paint filter test. This dewatering will be performed within the confines of the creek sides as specified. Also as specified, none of the water onsite, including the water in Dead Creek and Site M, will be treated in any manner. If it is necessary to remove any water from the creek or Site M, the water will be pumped to the north end of the creek, where a bermed area will be created for water storage. To the greatest extent possible, surface water will be diverted from all sides of Sector B and Site M to minimize the volume of surface water flowing into these areas.

As specified, CWM-ENRAC does not intend to backfill the areas of Site M where the sediments have been removed. The work damaged areas of Site M, such as the banks, will be backfilled as necessary, regraded, and reseeded. The area of Dead Creek Sector - B where sediments are removed, will be backfilled and compacted with an equivalent volume of clean fill dirt, as specified. Any creek sides damaged by onsite work will be regraded and seeded to prevent future erosion of the creek banks.

1.4 Transportation and Disposal

Dewatered sediments passing the paint filter test will be loaded into lined 20 cubic yard, semi-trailer dump trucks for transportation to the disposal facility. Details of the truck loading plans, including on-site traffic patterns and the number and frequency of trucks leaving the site, will be provided with CWM-ENRAC's formal bid proposal for this project. In addition, the formal bid proposal will include the waste management plan detailing the manner in which the truckloads shipped offsite will be tracked from site departure to arrival at the disposal facility.

The disposal of the dewatered sediments will be at a Monsanto-approved hazardous waste landfill (Subtitle C). The waste management plan to be provided in CWM-ENRAC's formal bid proposal will include the steps and costs associated with free liquids that may occur within a truckload of the dewatered sediments during transportation.

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2.0 ESTIMATED COSTS

CWM-ENRAC has estimated project costs for the tasks identified in the Preliminary Scope of Work provided by Monsanto. These costs have been categorized into the following segments of the work as specified in Monsanto's letter of February 5, 1992.

1. Provide Workplans \$ 15,000
2. Perform All Onsite Activities \$ 550,000
3. Transportation to Landfill 9,000 Tons @ \$55/Ton \$ 495,000
4. Landfill Disposal 9,000 Tons @ \$260/Ton \$2,340,000
(Including Current Disposal Taxes*)

BUDGET ESTIMATE TOTAL ($\pm 30\%$)

40% off our
\$3,400,000
Contract PCB prices?

**Note: The U.S. Supreme Court recently agreed to consider CWM's challenge to the legality of the State of Alabama's differential tax on the disposal of in-state and out-of-state hazardous waste at CWM's Emelle, Alabama facility. CWM fully expects the Court to rule in our favor in this matter. Please reference the attached Chicago Tribune article for further information on this issue.*

The budget estimate costs tabulated above are based primarily on CWM-ENRAC's experience in performing previous, similar projects. To the best of our knowledge and understanding of the project specifications, and given current market and regulatory conditions, the costs tabulated above for Monsanto's Preliminary Scope of Work are accurate to within $\pm 30\%$ as specified in Monsanto's letter of February 5, 1992.

260.00
- 116.50 tax

Gate rate = \$240

\$143.50 ~ 40% discount

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High court to hear case on fees for hazardous waste

By Linda P. Campbell
Chicago Tribune

WASHINGTON—The U.S. Supreme Court agreed Monday to consider whether states may collect special fees on hazardous waste imported from outside their boundaries.

Chemical Waste Management Inc. of Oak Brook, a publicly traded subsidiary of Waste Management Inc., is challenging an attempt by Alabama to levy a \$72-per-ton fee on out-of-state material dumped at the company's hazardous-waste disposal facility there.

The Supreme Court said it would limit its review to that fee and not a separate, \$25.60-per-ton fee imposed simultaneously on all waste dumped in Alabama.

The company appealed to the nation's highest court a decision by the Alabama Supreme Court that both fees on dumping at the company's Emelle, Ala., facility were legal. Company officials said Emelle is the only privately owned hazardous-material landfill in Alabama.

Chemical Waste Management operates similar facilities in New York, Louisiana, Illinois, California, Oregon and Indiana.

New York and Louisiana also have attempted to limit the importation of hazardous waste from beyond their borders, as has South Carolina, which has a hazardous-waste processing center operated by another company. Chemical Waste negotiated a settlement in the New York case, but has filed suit against Louisiana.

The Supreme Court decision accepting the case means arguments could be held as early as April, and a decision could be handed down in July.

Lawyers for Chemical Waste Management contend the \$72-per-ton tax on out-of-state waste violates the interstate commerce clause of the U.S. Constitution, which reserves to the federal government the regulation of commerce across state lines.

The Bush administration, in a friend-of-the-court brief sought by the U.S. Supreme Court, earlier urged the court to review the Chemical Waste appeal and supported the company's argument that prior court cases support its position. Such amicus curiae briefs, though not binding, are considered influential.

Industry officials are concerned about state attempts to limit landfills, especially those accepting hazardous materials, to local use.

Alabama in 1990 imposed the \$26.50-per-ton fee on all hazardous waste dumped at commercial landfill facilities in the state. The law imposed an additional \$72-per-ton fee on out-of-state waste and capped the annual volume of interstate materials at the level dumped during the first 12 months of the law's existence.

The effect of both fees was to increase the cost of interstate material dumped at Chemical Waste's Emelle landfill to \$115 a ton from about \$15 per ton.

The Emelle landfill is one of the nation's largest hazardous-waste disposal facilities. It handles about a third of the waste from Superfund cleanup sites across the nation, and 85 to 90 percent of the material dumped here is from outside Alabama.

David Young in Chicago contributed to this report.

CHICAGO TRIBUNE



3.0 PRELIMINARY PROJECT SCHEDULE

Attached is CWM-ENRAC's preliminary project schedule for the Monsanto - Dead Creek project indicating the number of days per week and the number of hours per day planned for doing the work.

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PRELIMINARY PROJECT SCHEDULE MONSANTO DEAD CREEK SECTOR B AND SITE M REMEDIATION PROJECT	Execution of Contract and Notice-to-Proceed		Estimated Time Frame																	
	Weeks																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
PREPARE WORKPLANS	■	■																		
WORKPLAN APPROVAL			■	■																
MOBILIZATION					■															
SITE PREPARATION						■														
SEDIMENT EXCAVATION							■	■	■	■										
SEDIMENT DEWATERING								■	■	■	■	■	■	■	■	■				
WATER MANAGEMENT								■	■	■	■	■	■	■	■	■	■			
LOADING OF SEDIMENTS									■	■	■	■	■	■	■	■	■			
SITE RESTORATION AND BACKFILLING													■	■	■	■	■			
DECONTAMINATION AND DEMOBILIZATION																	■	■		

* NOTE: This project would be performed on a six day per week basis. The work day would be ten to twelve hours per day, depending on the number of daylight hours available.



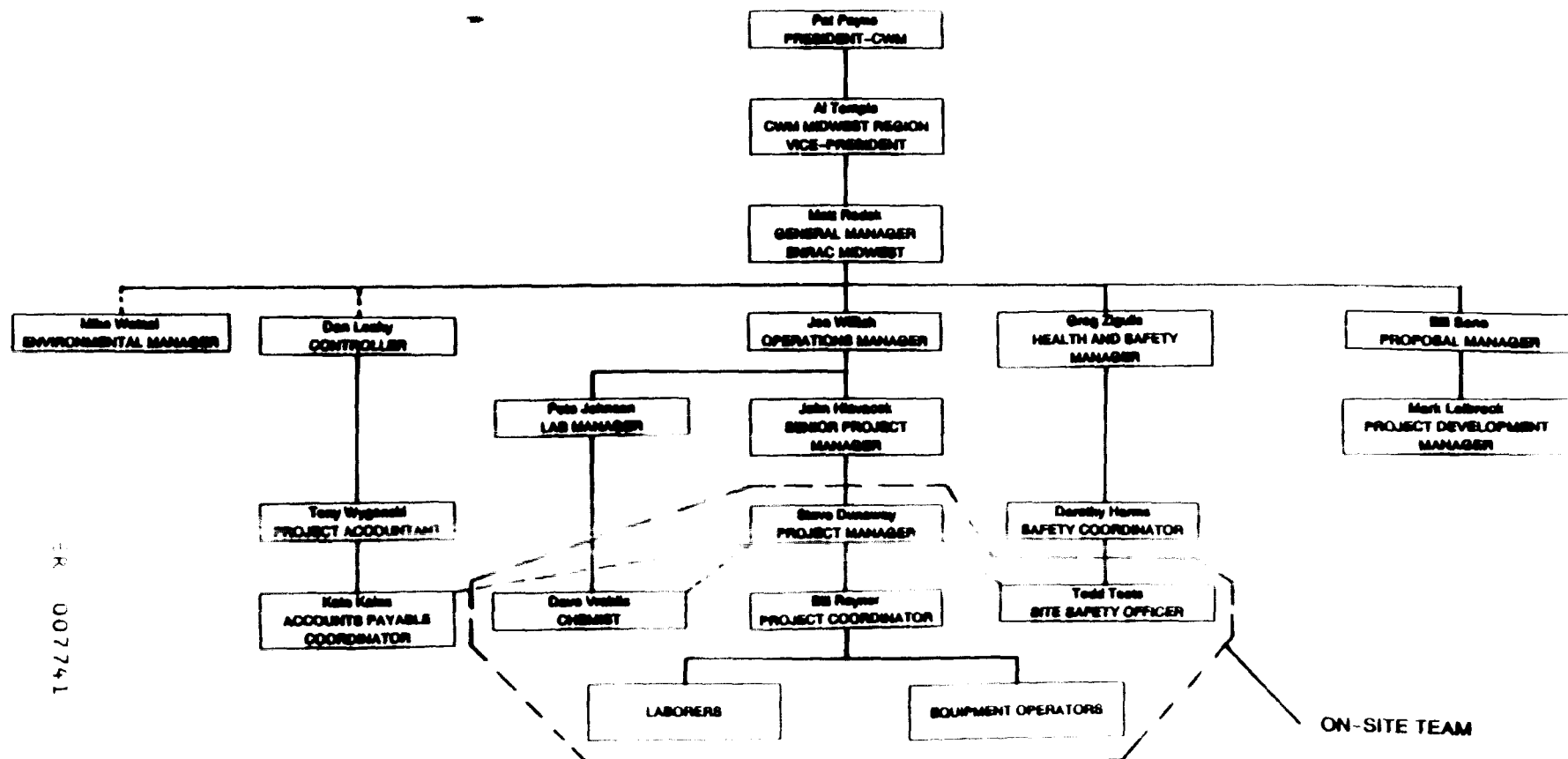
4.0 PRELIMINARY ORGANIZATION CHART

Attached is CWM-ENRAC's preliminary organization chart for the Monsanto - Dead Creek project. CWM-ENRAC would like to point out to Monsanto that the Senior Project Manager, Project Manager, Project Coordinator, and various other personnel assigned to this project acted in these same capacities during CWM-ENRAC's performance of similar remediation activities at the sector of Dead Creek located on the property of Cerro Copper Products in late 1990.

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**ORGANIZATION CHART
MONSANTO DEAD CREEK PROJECT WORK
CMM-ENRAC CONTROL NO. 91-11-212**



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